

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	CASE NO. 22-20823-GLT
)	
U LOCK INC.,)	CHAPTER 7
)	
Debtor.)	
_____)	
)	
JOHN B. JOYCE, ESQUIRE and JEREMY)	Document No.:
J. KOBESKI, ESQUIRE, Counsel for)	
Shanni Snyder,)	
)	
Movants,)	
vs.)	
)	
NO RESPONDENT(S),)	
)	
Respondent.)	

MOTION TO WITHDRAW APPEARANCES

AND NOW, comes undersigned counsel, as counsel for party in interest Shanni Snyder, hereby moves the court for an entry of an order permitting the withdrawal of John B. Joyce, Esquire and Jeremy J. Kobeski, Esquire, of Grenen & Birsic, P.C., and state as follows:

1. An Involuntary Petition for Relief under Chapter 7 of the United States Bankruptcy Code was filed against U Lock, Inc. (“Debtor” or “U Lock”) in the Bankruptcy Court for the Western District of Pennsylvania on or about April 27, 2022 [Doc. 1].

2. John B. Joyce, Esquire and Jeremy J. Kobeski, Esquire of Grenen & Birsic, P.C. entered their appearances on behalf of Shanni Snyder on or about November 10, 2022 for the limited engagement and purpose of the sale hearing on November 10, 2022 [Docs. 207 and 208].

3. The purpose of the engagement of John B. Joyce, Esquire and Jeremy J. Kobeski, Esquire has been concluded as the trustee sale has occurred [Doc. 254] as has Ms. Snyder's removal of tangible property she purchased in the trustee sale ahead of the January 27, 2023 deadline.

4. Additionally, Ms. Snyder has retained substitute counsel, John P. Lacher, Esquire and David L. Fuchs, Esquire, who entered their appearances on her behalf on February 10, 2023 [Docs. 326 and 327].

5. Therefore, John B. Joyce, Esquire and Jeremy J. Kobeski, Esquire wish to withdraw their appearances on behalf of Ms. Snyder.

6. Undersigned counsel certify that Ms. Snyder has expressly consented to their withdrawal.

WHEREAS, John B. Joyce, Esquire and Jeremy J. Kobeski, Esquire of Grenen & Birsic, P.C. respectfully request the entry of an order withdrawing their appearances in the above-captioned matter.

GRENNEN & BIRSIC, P.C.

Dated: February 14, 2023

By: /s/ John B. Joyce
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